

JA 4027

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ZUCKER, GOLDBERG & ACKERMAN

Attorneys for Secured Creditor

Midfirst Bank f/k/a Midland Mortgage Co

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|-------------------|---|------------------------------------|
| | : | UNITED STATES BANKRUPTCY COURT |
| | : | FOR THE DISTRICT OF NEW JERSEY |
| IN RE: | : | |
| | : | CHAPTER 13 |
| Diane L. Callahan | : | |
| | : | CASE NO. 10-28329-13 |
| | : | NOTICE OF OBJECTION |
| | : | (CONFIRMATION HEARING DATE: |
| DEBTOR. | : | Not Yet Assigned) |

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, attorneys for Secured Creditor, Midfirst Bank f/k/a Midland Mortgage Co, the holder of a Purchase Money Mortgage on the debtor's premises at 963-65 Carol Avenue, Cape May, NJ 08204-4939, hereby objects to the confirmation of the debtor's proposed Chapter 13 Plan in the event the debtor fails to make the regular monthly mortgage payments to the Secured Creditor, outside of the Chapter 13 Plan, in accordance with the provisions of said Plan, in violation of 11 U.S.C. 1326.

Furthermore, the Secured Creditor objects to any provision in the debtors plan which provides for an amount less than the amount due the Secured Creditor as set forth in its Proof of Claim.

In the event the debtor cures the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

ZUCKER, GOLDBERG & ACKERMAN
Attorneys for Secured Creditor
Midfirst Bank f/k/a Midland Mortgage Co

/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

**THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**